



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107

*John's Copy*

24535

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

NOV 14 1989

J. C. Violette, Plant Manager  
E. I. duPont de Nemours & Company  
New James Street  
Towanda, PA 18848

Re: Bell Sanitary Landfill

Dear Mr. Violette:

The United States Environmental Protection Agency ["EPA"] is seeking information concerning the release, or threat of release, of hazardous substances into the environment at or on property located in Terry Township in southeast Bradford County, Pennsylvania and north of the villages of Evergreen and New Era, Pennsylvania ["Site"]. EPA previously requested certain information of DuPont relevant to this property by letter dated May 19, 1987. DuPont submitted a response dated June 12, 1987.

DuPont's June 12 response reports that approximately 1100 tons of "non-hazardous trash" was sent to the Site from DuPont's Towanda, Pennsylvania plant between 1973 and 1980. An Eckhardt Report (appended hereto as "Attachment A") enclosed with DuPont's response suggests that nearly 100% of this 1100 tons of waste consisted of "polyester film and polyethylene film with a thin coating in between" and contained such substances as acrylates, latex emulsion, plastizers, resins, elastomers, ethers, polyester, and polyethylene. DuPont's response contained several other documents relevant to EPA's investigation and which are further described below.

Pursuant to the authority of section 3007(a) of the Resource Conservation and Recovery Act ["RCRA"], 42 U.S.C. § 6927(a), and section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ["CERCLA"], 42 U.S.C. § 9604(e), you are requested to furnish EPA with all information and documents in DuPont's possession, custody, or control, or in the possession, custody, or control of DuPont's officers, employees, or agents, which concern, relate to, or refer to the following:

1. Please identify the substances and products produced at DuPont's Towanda, Pennsylvania plant between 1966 and the present and identify --

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(a) the nature and amount of by-products and wastes (including, without limitation, "non-hazardous trash") produced through the manufacture of the substances and products produced;

(b) the individuals or entities responsible for transporting, storing, treating, or otherwise disposing of the by-products and wastes resulting from the manufacture of the substances and products produced;

(c) the dates persons identified in response to No. 1(b) transported, stored, treated, or otherwise disposed of such by-products and wastes at the Site;

(d) the method used by DuPont to document the removal of by-products and wastes from its Towanda, Pennsylvania plant premises.

2. Please identify the chemical constituents of the acrylates, latex emulsions, plastizers, resins, elastomers, ethers, and the "thin coating" between polyester and polyethylene films referenced in Attachment A.

3. An unsigned, undated, handwritten document submitted to EPA with DuPont's June 12, 1987 response (appended hereto as "Attachment B") describes the "mixed industrial waste and municipal refuse" disposed of at the Site as consisting of "[m]ostly coated scrap" containing acrylates, amines, resins, and plastizers. Please identify the chemical content of the "mixed industrial waste and municipal refuse" taken to the Site other than the "coated scrap" referred to in the document.

4. An April 13, 1977 company memorandum from L. H. Piestrak to M. P. Dunkle summarizing a telephone conversation with O. M. Bell (appended hereto as "Attachment C") reports that "Bell sees no problem in landfilling chemically contaminated paper towels" and that Bell "could probably landfill [DuPont's] Packaged Lab Chemical Drums." Please state whether such "chemically contaminated paper towels" and/or "Packaged Lab Chemical Drums" were removed by O. M. Bell or taken to the Site and identify and provide documents relating to --

a. the circumstances under which such paper towels became contaminated;

b. the chemical constituents contaminating such paper towels;

c. the volume of chemically contaminated paper towels removed from DuPont's premises;

d. the identity of persons or entities responsible for removing such contaminated paper towels from DuPont's premises and the dates such paper towels were removed;

e. the contents of the "Packaged Lab Chemical Drums" removed from DuPont's premises; and

f. the identity of persons or entities responsible for removing such drums from DuPont's premises and the dates such drums were removed.

5. An October 31, 1973 company memorandum to N. L. Cross regarding "Solid Waste Removal by O. M. Bell" (appended hereto as "Attachment D") states that "containers or materials that have traces or remains of chemicals are not to be placed in the compactor unless specifically approved by the Chemical Hazards Sub Committee;" that "Lydell solid wastes will be picked up by Bell with a regular truck until the second compactor is installed, inspected, and approved;" and that "[s]olid chemical wastes and chemical containers, until classified by the Sub Committee, will be segregated, per plant procedure, and removed by Bell in a regular truck." Please identify --

a. the persons and/or entities responsible for emptying the compactor and the location(s) for disposal of compactor wastes;

b. the materials typically placed into the compactor for disposal;

c. whether and to what extent the "Chemical Hazards Sub Committee" ever approved placement of "containers or materials that have traces or remains of chemicals" into the compactor;" the dates such approvals were given and the specific chemical wastes approved for disposal in the compactor; the dates such wastes were removed from the compactor for disposal; and the person/entity that removed such compactor wastes from DuPont's premises and the location(s) for disposal of such wastes;

d. the chemical constituents of the "Lydell solid wastes" picked up by Bell; the dates such wastes were picked up by Bell; and the location for disposal of such wastes;

e. the chemical constituents of the "[s]olid chemical wastes and chemicals containers" removed from DuPont's premises by Bell; the dates such wastes were picked up by Bell; and the location for disposal of such wastes.

Your answers to these inquiries should include copies of any

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and all documents maintained by you related to the above-described matters. As used herein, the terms "documents" shall include, without limitation, invoices, checks, receipts, bills of lading, weight receipts, toll receipts, correspondence, contracts, agreements, deeds, leases, manifests, licenses, permits, bids proposals, logs, books of original entry, minutes of meetings, memoranda, notes, calendar or diary entries, agendas, bulletins, notices, announcements, charts, maps, photographs, drawings, brochures, reports of scientific study or investigation, schedules, price lists, telegrams, teletypes, recordings of any type, computer printouts, or other data compilations from which information may be obtained or translated. The author and custodian of each submitted document should be identified.

You should identify the date, author, current location, and custodian of each document submitted, and describe all efforts that were undertaken by you to identify such documents. If information was obtained through employee interviews, the name of the employee and subject of the interview should be provided.

You are entitled to assert a claim of business confidentiality covering any part of the submitted information in the manner described in 40 C.F.R. Part 2, Subpart B. Information subject to a claim of confidentiality will be made available to the public only in accordance with the procedures set forth in 40 C.F.R. Part 2, Subpart B. Unless a business confidentiality claim is asserted at the time the information is submitted, EPA may make such information available to the public without further notice to you.

Failure to respond truthfully and fully to each inquiry within ten (10) days of your receipt of this letter, or to adequately justify your failure to respond, may result in an enforcement action by EPA pursuant to section 104 of CERCLA or section 3008 of RCRA. These statutes permit EPA to seek the imposition of penalties of up to \$25,000 for each day of continued non-compliance. Be further advised that the provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001.

Please send all information and documents responsive to this letter to:

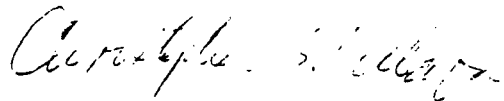
John Rajkowski (3HW11)  
U.S. Environmental Protection Agency  
841 Chestnut Building  
Philadelphia, PA 19107

If you have any questions concerning this matter, please contact Mr. Rajkowski at (215) 597-6682.

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This information request letter is not subject to the Office and Management and Budget review under the Paperwork Reduction Act, 44 U.S.C. §§ 3501-3520.

Sincerely,



Peter W. Schaul, Chief  
Superfund Programs Branch

Attachments

AR200071

FORM A: GENERAL FACILITY INFORMATION

Company Name: E I du Pont - de Nemours & Co PHOTO PRODUCTS DEPT

Facility Name: Townsend Plant

Address: James St  
No. Street  
Townsend Va 15545  
City State Zip Code

Name of Person Completing Form: W D Bills

Position: Area Supervisor - Environmental Control

Phone Number: (717) 265-6141

1. Year Facility Opened ..... 19 47 (10-11)

2. Primary SIC Code , ..... 2811 (12-15)

3. Estimate the total amounts of process wastes (excluding wastes sold for use) generated by this facility during 1978:

thousand gallons ..... 111111 (16-24)

hundred tons ..... 1111115 (25-32)

thousand cubic yards ..... 1111111 (33-41)

4. Estimate (in whole percents) how these process wastes generated in 1978 were disposed of:

in landfill ..... 17 (42-46)

in pit/pond/lagoon ..... 113 (45-47)

in deep well ..... 11 (48-50)

incinerated ..... 115 (51-53)

reprocessed/recycled ..... 111 (54-56)

evaporated ..... 111 (57-59)

unknown ..... 111 (60-62)

other (Specify \_\_\_\_\_) ..... 111 (63-65)

5. What is the total number of known sites (including disposal on the property where this facility is located as one site) that have been used for the disposal of process wastes from this facility since 1950? ..... 114 (66-68)

COMPLETE ONE FORM "B" FOR EACH OF THE SITES

6. Have any of the process wastes generated at this facility been hauled (removed) from this facility for disposal? (Yes=1; no=2) ..... 1 (69)

IF YES, COMPLETE FORM "C"

7. Do you know the disposal site locations of all of the process waste hauled from your facility since 1950? (Yes=1; no=2) ..... 1 (70)

IF NO, COMPLETE ONE FORM "D" FOR EACH FIRM OR CONTRACTOR WHO TOOK WASTE TO AN UNKNOWN LOCATION

8. Specify the earliest year represented by information from company or facility records supplied on this and other forms ..... 19 71 (71-72)

9. Specify the earliest year represented by information from employee knowledge supplied on this and other forms ..... 19 71 (73-74)

R200072

## FORM B: DISPOSAL SITE INFORMATION

(1-8)  
(DO NOT USE)

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: E I du Pont - PHOTO PRODUCTS DEPTFacility Name: Towanda PlantName of Site: Roller Sanitary LandfillAddress of Site: Terry Township

no. street

Bradford CountyPa18848

city

state

zip code

Name of Owner (while used by facility): D.M. BellAddress: R.D. 2 Box 177A

no. street

TowandaPa18849

city

state

zip code

Current Owner (if different from above):

Address:

no. street

city

state

zip code

1. Location (1= the property on which facility is located; 2= off-site)..... ☒ (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) ..... ☒ (11)
3. Current status (1= closed; 2= still in use; 9=don't know) ..... ☒ (12)  
IF CLOSED, specify year closed ..... 19 ☒ (13-14)
4. Year first used for process waste from this facility ..... 19 ☒ (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) ..... 19 ☒ (17-18)
6. Total amount of process waste from this facility disposed at site:  
thousand gallons ..... ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ (19-26)  
hundred tons ..... ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ (27-33)  
thousand cubic yards ..... ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)  
landfill, mono industrial waste ..... ☒ (42)  
landfill, mixed industrial waste ..... ☐ (43)  
landfill, drummed waste ..... ☒ (44)  
landfill, municipal refuse co-disposed ... ☐ (45)  
pits/ponds/lagoons ..... ☒ (46)  
deep well injection ..... ☒ (47)  
land farming ..... ☐ (48)  
incineration ..... ☒ (49)  
treatment (eg. neutralizing)..... ☒ (50)  
reprocessing/recycling ..... ☒ (51)  
other (specify) ..... ☐ (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) ..... ☒ (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

Not Known

FORM B CONTINUED ON SECOND PAGE

(1) (50)

AR200073

1952

تاریخ و نام

Bottle Sentences, London

- FILL IN EVERY BLOCK SPACE**

Acid solutions, with pH < 3	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH > 12	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	2	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	2	(24)
chromium (hexavalent)	2	(25)
lead	2	(26)
Radioactive residues, > 50 pCi/liter	2	(27)
uranium residuals & residuals for UF <sub>6</sub> recycling	2	(28)
lanthanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	2	(34)
insecticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	2	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCE/PBB's	2	(42)
amides, amines, imides	2	(43)
plasticizers	2	(44)
resins	2	(45)
elastomers	2	(46)
solvents polar (except water)	2	(47)
carbon tetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	2	(50)
solvents halogenated aliphatic	2	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	2	(54)
alcohols	2	(55)
ketones & aldehydes	2	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc.	2	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	2	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P <sub>4</sub> , aluminum chloride)	2	(67)
wastes with flash point below 100° F.	2	(68)

(1) NEARLY 100% of waste is polyester film and polyethylene film with a thin coating in between

**[2] (SO)**

AR200074



## Disposal Sites - Eckhardt questionnaire

Towanda landfill (1950-1975) 900 tons total. Not used by Towanda plant at present.

A questionnaire indicates "landfill, mixed industrial waste + drummed waste, still in use". This is true, but not in use by us. It indicates "pit/pond/lagoon, no longer in use". ~~There is an area that was not longer~~

Among items listed as having been disposed here are Cd, Pb, Zn, Cr, Th and most likely in form of insoluble salts (phosphates). Trichloroethylene + CCl<sub>4</sub> also listed.

No PCB's, radioactive, asbestos or asbestos were disposed.

Bulk of materials disposed were resins, plastics, elastomers, + mostly coated scrap.

Plant Disposal (1947-1973) 300 tons total.

A questionnaire indicates "pit/pond/lagoon incineration, treatment + evaporation" used.

Cd, Pb, Zn + Cr are listed among the items disposed of. These are most likely in soluble salts.

AR200075

## Disposal sites -

(2)

2. Mat'l excavated was used as fill under plant road?? - Foul Planning

No PCB's, radioactive, Dioxins or asbestos disposed of.

Tridene + CCl<sub>4</sub> tested, but these are lost through evaporation.

Bell - 1975 to date (1100 tons)

Q westernmore indicates "mixed industrial waste municipal refuse"

Mostly coated scrap is disposed of here (Angle, resins, plasticizers, etc.)

No Tridene, CCl<sub>4</sub>, heavy metals, PCB's, radioactive, Dioxins or asbestos

4 ChemTrol 1971 to date (1100 tons)

Q westernmore indicates "landfill mixed industrial + domestic, pit/pool/leachate treatment processing"

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(3)

Among items sent are Acids, heavy  
metals (incl. Zn, Cd, Cr, Pb, Sb) acrylates,  
amine, plasticizer, resin, elastomers, polar solvents,  
halogenated aliphatics, inorganic salts.

No ~~are~~ Dioxins, asbestos, PCB's or other  
active sent.



E. I. DU PONT DE NEMOURS & COMPANY  
INCORPORATED

TOWANDA, PA. 18848

PHOTO PRODUCTS DEPARTMENT

CC: R. B. Packard  
B. K. Saydlowski  
W. R. Marshall  
File: SV 0705

April 13, 1977

TO: M. P. DUNKLE  
FROM: L. H. PIESTRAK *LHP.*

RE: WASTE DISPOSAL

A telephone conversation on 4/11/77 with O. M. Bell, R. B. Packard, and myself led to the following information:

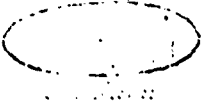
1. The Bell landfill is approved by the State and officials investigate it on a weekly/bi-weekly basis.
2. The State did not give Bell a list of what could and could not be landfilled. He depends on the inspectors to tell him if a new waste is acceptable after it is included in the landfill. When an inspector sees an infraction, Bell is told to discontinue landfilling with that waste. Bell does not think it wise to contact the State for information before landfilling.
3. Bell sees no problem in landfilling chemically contaminated paper towels. However, he asked for information before collection to make provisions for protection of his people.
4. Bell stated that he could probably landfill our Packaged Lab Chemical Drums without State objection, as long as precautions are taken, on plant, to pack them with compatible chemicals and mark them for segregation at the site.

Based on the information above (#2), I do not think it would be wise to send the Packaged Lab Chemical Drums to the Bell landfill. We have no assurance of State approval. However, I agree that sending contaminated paper towels to Bell should pose no problem as long as they are sealed in bags or boxes.

LHP/jar  
4/13/77

ATTACHMENT C

AR200078

  
E. I. DU PONT DE NEMOURS & COMPANY  
INCORPORATED

TOWANDA, PA. 16868

PHOTO PRODUCTS DEPARTMENT

cc: W.R. W. [unclear]  
S.O. [unclear]  
F.J. [unclear]  
M.P. [unclear]  
P. Vandevliet  
D.D. Dickerson  
C.W. Van [unclear]  
T.A. Fort [unclear]  
G.M. Fairchild  
H.E. Dalmon  
R. Coleman  
E.A. Reddyden  
R.A. Watkins  
T. Gambel

OCTOBER 31, 1973

TO: N.L. Cross

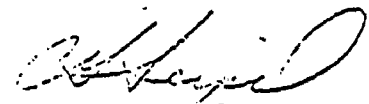
Status Report

Solid Waste Removal by O.M. Bell

1. For the recommendations of the Process Hazard Review Sub Committee, Bell has installed a gate and hopper cover screen. A follow-up review should now be held by the Review Committee and (or) Acceptance Committee.
2. R.A. Watkins has written an operational procedure for the compactor. (See attached.) Note that containers or materials that have traces or remains of chemicals are not to be placed in the compactor unless specifically approved by the Chemical Hazards Sub Committee.
3. On October 30, 1973, D.D. Dickerson and C.G. Seipel met with Mr. and Mrs. O.M. Bell. The following was agreed upon:
  - A: Facilities Planning (T. Gambel) will provide a temporary road over the sewer line so Bell can get to the compactor in the old #3 parking lot.
  - B. Acceptance Committee must approve Bell's modifications to the compactor to assure compliance.
  - C. Lydal<sup>®</sup> solid wastes will be picked up by Bell with a regular truck until the second compactor is installed, inspected, and approved.

Lydal<sup>®</sup> - DuPont's Registered Trademark for Photopolymer Lithographic Printing Plates

- D. Solid chemical wastes and chemical containers, until classified by the Sub Committee, will be segregated, per plant procedure, and removed by Bell in a regular truck.
- E. Bell will start picking up the subject matter on November 5, 1973.
- 4. D.D. Dickerson will contact R. Heath to discontinue his services as of November 5, 1973.

  
C.G. Seipel  
Control Superintendent

CCS/smp

Attachment

AR200080